

AKIN GUMP STRAUSS HAUER & FELD LLP
One Bryant Park
New York, New York 10036
(212) 872-1000 (Telephone)
(212) 872-1002 (Facsimile)
Ira S. Dizengoff
Michael P. Cooley
Alexis Freeman

Proposed Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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|-------------------------------------------------------------|---|-------------------------|
| _____ |) | |
| In re: |) | Chapter 11 |
| |) | |
| ARCHBROOK LAGUNA HOLDINGS LLC, <i>et al.</i> , ¹ |) | Case No. 11-13292 (SCC) |
| |) | |
| Debtors. |) | Jointly Administered |
| _____ |) | |

**NOTICE OF DATES AND DEADLINES RELATING
TO THE DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105,
363, 365, 503 AND 507 AND FED. R. BANKR. P. 2002, 4001, 6004, 6006,
9008 AND 9014, FOR ENTRY OF (I) AN ORDER APPROVING (A) BID
PROCEDURES, (B) NOTICE OF SALE, AUCTION, AND SALE HEARING, (C)
ASSUMPTION PROCEDURES AND RELATED NOTICES; AND (II) AN ORDER
APPROVING THE SALE OF SUBSTANTIALLY ALL OF THE DEBTORS' ASSETS**

PLEASE TAKE NOTICE that on July 9, 2011, the above-captioned debtors and debtors in possession (collectively, the “***Debtors***”) filed the *Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363, 364, 365, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6004, 6006, 9008 and 9014 for Entry of (I) an Order Approving (A) Bid Procedures, (B) Notice of Sale, Auction, and Sale*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal taxpayer identification number, are: ArchBrook Laguna LLC (6166); ArchBrook Laguna Holdings LLC (6156); Chimerica Global Logistics LLC (3745); ArchBrook Laguna West LLC (9631); Lehrhoff ABL LLC (6386); Expert Warehouse LLC (4487); and ArchBrook Laguna New York LLC (5385).

Hearing, (C) Assumption Procedures and Related Notices; and (II) an Order Approving the Sale of Substantially All of the Debtors' Assets [Docket No. 12] (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that on July 9, 2011, the Debtors filed the *Motion to Shorten the Time for Notice of the Hearing to Consider the Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363, 364, 365, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6004, 6006, 9008 and 9014, for Entry of (I) an Order Approving (A) Bid Procedures, (B) Notice of Sale, Auction, and Sale Hearing, (C) Assumption Procedures and Related Notices; and (II) an Order Approving the Sale of Substantially All of the Debtors' Assets* [Docket No. 13] (the “**Motion to Shorten Notice**”). By the Motion to Shorten Notice, the Debtors sought entry of an order shortening the notice period with respect to the Motion by scheduling the hearing to consider the Motion on July 19, 2011.

PLEASE TAKE FURTHER NOTICE that on July 12, 2011, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) entered the order [Docket No. 40] (the “**Order Granting Shortened Notice**”) granting the relief requested in the Motion to Shorten Notice as set forth in the Order Granting Shortened Notice and as summarized below. The Debtors file this notice to inform parties in interest of the following dates related to the Motion:

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|------------------------------------------|----------------------------------|
| Bid Procedures Objection Deadline | July 20, 2011 at 10:00 a.m. (ET) |
| Bid Procedures Hearing | July 20, 2011 at 2:00 p.m. (ET) |

PLEASE TAKE FURTHER NOTICE that if you would like to obtain a copy of the Motion, any exhibits related thereto or any other pleadings filed in these chapter 11 cases, you should contact The Garden City Group, Inc., the claims agent retained by the Debtors in these

chapter 11 cases, by: (a) calling the Debtors' restructuring hotline at (888) 579-1199; (b) visiting the Debtors' restructuring website at: www.archbrookrestructuring.com; (c) e-mailing the Debtors at ARBTeam@gcginc.com; and/or (d) writing to ArchBrook Laguna Holdings, LLC, c/o The Garden City Group, Inc., P.O. Box 9792, Dublin, Ohio 43017. Registered users of the Public Access to Court Electronic Records (PACER) System may also obtain copies of any pleadings filed in these chapter 11 cases for a fee at the Court's website at <http://www.nysb.uscourts.gov>. Finally, you may request hard copies from the Debtors' undersigned counsel.

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and the Bankruptcy Court's Order Establishing Certain Notice, Case Management and Administrative Procedures [Docket No. 33] (the "***Case Management Order***"), shall be filed with the Bankruptcy Court either (a) electronically in accordance with General Order M-399 (which can be found at <http://www.nysb.uscourts.gov>) by registered users of the Bankruptcy Court's filing system, or (b) on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), and shall be served in accordance with General Order M-399 on: (a) Akin Gump Strauss Hauer & Feld LLP, as proposed counsel to the Debtors and Debtors in possession; (b) the Office of the United States Trustee for the Southern District of New York; (c) the entities listed on the Declaration Concerning List of the Debtors' 30 Largest Unsecured Claims on an Consolidated Basis filed pursuant to Bankruptcy Rule 1007(d); (d) GE Capital Commercial Services, Inc., as administrative agent under the Debtors' prepetition credit facility and debtor in possession credit facility; (e) Latham & Watkins LLP, as counsel to GE

Capital Commercial Services, Inc.; (f) the Internal Revenue Service; (g) the Securities and Exchange Commission; (h) the United States Attorney for the Southern District of New York; and (i) parties in interest who have filed a notice of appearance in these cases pursuant to Bankruptcy Rule 2002; in each case so as to be received no later than **July 20, 2011 at 10:00 a.m. (prevailing Eastern Time)** (the “*Response Deadline*”).

PLEASE TAKE FURTHER NOTICE that if no responses with respect to the Motion are timely filed and served in accordance with the Case Management Order, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

New York, New York
Dated: July 12, 2011

/s/ Ira S. Dizengoff
AKIN GUMP STRAUSS HAUER & FELD LLP
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New York, New York 10036
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